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# **Department of Energy**

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APR 2 3 2002

Mr. Paul Pardi, RCRA Group Leader and FFCA Project Manager Ohio Environmental Protection Agency Division of Hazardous Waste Management 401 East 5<sup>th</sup> Street Dayton, Ohio 45402-2911 DOE-0444-02

SUBMITTAL OF CROSS-REFERENCE INDEX PURSUANT TO THE DIRECTOR'S FINAL FINDINGS AND ORDERS FILED JUNE 6, 1996: DRAFT LABORATORY COMPLEX IMPLEMENTATION PLAN

Reference:

Letter and Director's Final Findings and Orders (DF&O), Thomas E. Crepeau, OEPA to Phil Hamric, United States DOE and John Bradburne, FERMCO, dated June 6, 1996

In accordance with Section V, Order #2 of the referenced Director's Final Findings and Orders (DF&O), enclosed is a cross-reference index of Hazardous Waste Management Unit (HWMU) closure components and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) documents for those HWMUs identified in Attachment A of the DF&O. The index links specific components of Ohio Environmental Protection Agency's (OEPA) Closure Plan Review Guidance for RCRA Facilities related to substantive closure requirements with the appropriate CERCLA document, which addresses those components. The list is cumulative and provides page numbers and sections for those CERCLA documents that have already been submitted.

Section V of the DF&O requires the Fernald Environmental Management Project (FEMP) to provide an updated copy of the cross-reference table following the submittal of a referenced CERCLA document. The <u>Draft Laboratory Complex Implementation Plan</u> was submitted to the OEPA and United States Environmental Protection Agency (USEPA) on April 18, 2002. The specific references to this document in the cross-reference table have been highlighted.

Mr. Paul Pardi

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DOE-0444-02

If you have any questions regarding this matter, please contact Ed Skintik at (513) 648-3151.

Sincerely,

Johnny W. Reising

Fernald Remedial Action

Project Manager

FEMP:Skintik

Enclosure: As Stated

cc w/enclosure:

E. Skintik, OH/FEMP

T. Hagen, Fluor Fernald, Inc./MS65-2

R. V. Holmes, Fluor Fernald, Inc./MS3

T. A. Poff, Fluor Fernald, Inc./MS65-2

M. Stevens, Fluor Fernald, Inc./MS87

AR Coordinator, Fluor Fernald, Inc./MS78

RCRA Operating Record, Fluor Fernald, Inc./MS28

cc w/o enclosure:

J. Saric, USEPA-V, SRF-5J

T. Schneider, OEPA-Dayton

CLOSURE PLAN COMPONENT <sup>1</sup>	CERCLA DOCUMENT	CROSS REFERENCE INDEX
Description/Detailed Drawing of Waste     Management Unit(s) to be Closed (Closure     Guidance Item 3.2 and 3.4)	OU1 FINAL Remedial Investigation Report, August1994	Waste Pit 4 (27): Description, pp. 1-23 to 1-24; History, pp. 1-35 to 1-36; Drawings, pp. 1-83, 1-88 Waste Pit 5 (42): Description, p. 1-24 to 1-27; History, pp. 1-36 to 1-37; Drawings, pp. 1-83, 1-89
	OU3 FINAL Integrated Remedial Design/Remedial Action Work Plan, May 1997	HWMU Component Number and Associated D&D complex: Table 3-10, p. 3-71 D&D Complex Locations: Figure 2-2, p. 2-17
	OU3 Implementation Plans for Above- Grade Decontamination and Dismantlement	Drawing of HWMU:  To be submitted for Each D&D Complex
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	FINAL Thorium/Plant 9 Complex Implementation Plan, August 1997	Plant 9 Warehouse - Bldg. 81 (35): Figure D-10, D-11
	FINAL Misc. Small Structures Implementation Plan, October 1998	Waste Oil Decant Shelter (component of Trane Incinerator ) (28):  No drawing available for this unit
		KC-2 Warehouse – Bldg. 63 (34): Figure D-22, D-23
		UNH Tanks – NFS Storage Area (46): Figure D-1
	FINAL Implementation Document for HWMUs #28 and #50 , December 1998	Trane Incinerator (28): Attachment 1
	1000	UNH Tanks - Raffinate Bldg. (50): Attachment 2
	FINAL Plant 6/East Warehouse Complex Implementation Plan, July 1999	Plant 6 Warehouse - Bldg. 79 (37): Appendix D
	FINAL Multi-Complex Implementation Plan, October 2001	NAR System (10), Box Furnace (14), Oxidation Furnace #1 (15), Plant 8 Warehouse - Building 80 (29), UNH Tanks - North of Plant 2 (47), UNH Tanks - Southeast of Plant 2 (48), UNH Tanks - Digestion Area (49): Appendix D
	DRAFT: Laboratory: Complex Implementation Plan; April 2002	Pilot Plant Warehouse - Bidg: 68;(33): 'Appendix D



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·	FINAL Misc. Small Structures Implementation Plan, October 1998	Waste Oil Decant Shelter (component of Trane Incinerator) (28): Section 3.17, p. 36
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		UNH Tanks – NFS Storage Area (46): Section 3.1, p. 23

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	OU5 Integrated Remedial Design Packages for Individual Remediation Areas	HWMU COCs: To be Submitted
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	OU3 FINAL Integrated Remedial Design/Remedial Action Work Plan May 1997	General Methods for Removing and Storing Waste: HWMU Decontamination, Section 3.2.3, p. 3-13; Materials Management, Section 3.3, pp. 3-30 to 3-63; HWMU Remediation (use of Safe Shutdown, D&D of complexes), Section 3.5.3, pp. 3-69 to 3-73
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		UNH Tanks - Digestion Area (49): Section 3.1, pp. 44 to 45
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	•	DRAFT Laboratory/Complex Implementation Plans April 2002	Pilot Plant Warehouse - Bldg. 68 (33): Section 4.0, p. 41
		OU5 FINAL Remedial Design Work Plan, August 1996	Schedule for Submitting Remedial Design Documents for Soil: Table 4-1, p. 4-6
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	OU1 FINAL Remedial Design Work Plan, June 1995	Revised ARARs: Tables A-24 and A-25
	OU5 FINAL Record of Decision, January 1996	Not Applicable, if Remediation Levels for Soil and Groundwater are Sufficient for a Clean Hazardous Waste Management Unit Closure <sup>1</sup> :  ARARs: Table B-3, p. B.3-10



11. Certification (Closure Guidance Item 3.18)  OU3 Project Completion Reports  OU3 Project Completion Reports  FINAL Plant 1 Complex – Phase 1 Project Completion Report, December 1997  FINAL Thorium/Plant 9 Complex Project Completion Report, April 1999  FINAL Project Completion Report for the Decontamination of HWMU No. 50 – UNH Tanks, Hot Raffinate Building and HWMU No. 28 – Trane Incinerator, May 1999  FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report, October 1999  FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report, October 1999  FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report, October 1999  FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report, October 1999  FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report, October 1999  FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report, October 1999  FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report, October 1999  FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report, October 1999  FINAL Miscellaneous Small Structures Decontamination And Dismantlement Project, Task Order #432 Completion Report, October 1999  FINAL Miscellaneous Small Structures Decontamination And Dismantlement Project, Task Order #432 Completion Report, October 1999  FINAL Miscellaneous Small Structures Decontamination And Dismantlement Project, Task Order #432 Completion Report, October 1999  FINAL Miscellaneous Small Structures Project, Task Order #432 Completion Report, October 1999  FINAL Miscellaneous Small Structures Project, Task Order #432 Completion Report, October 1999  FINAL Miscellaneous Small St	CNU33-NEFI	ENEINGE INDEX FOR FEIGIP HANDIO	CLOSURE PLAN COMPONENTS UNDER CERCLA
applicable)3 - CClosure Guidance Item .16) - Continued  Area 1, Phase II Integrated Remedial Design Package, September 1998  FINAL Implementation Plan for Area 3A/AA, May 2001  FINAL Implementation Plan for Area 3A/AA, May 2001  To be submitted (if applicable)  Studge Drying Beds (41): Included within Appendix A, Design Criteria Package, Table A-2, p. A-32, but not anticipated to be applicable since HWMU to be clean (risk-based) closed by removal.  Storage Pad North of Plant 6 (36): Included within Appendix A, Design Criteria Package, Table A-2, pp. A-69 to A-74, but not anticipated to be applicable since HWMU to be clean (risk-based) closed by removal.  Certification (Closure Guidance Item 3.18)  OU3 Project Completion Report  OU3 Project Completion Reports  FINAL Plant 1 Complex – Phase 1 Project Completion Report, December 1997  FINAL Thorium/Plant 9 Complex Project Completion Report, December 1997  FINAL Project Completion Report for the Decontamination of HVMU No. 50 – UNH Tanks, Hot Ratinate Building and HVMU No. 28 – Trane Incinerator, May 1999  FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report, Decontamination and Dismantlement Project, Task Order #432 Completion Report, Decontamination and Dismantlement Project, Task Order #432 Completion Report, Decontamination and Dismantlement Project, Task Order #432 Completion Report, Decontamination and Dismantlement Project, Task Order #432 Completion Report, Decontamination and Dismantlement Project, Task Order #432 Completion Report, Decontamination and Dismantlement Project, Task Order #432 Completion Report Report Project Completion Repor		CERCLA DOCUMENT	
Design Package, September 1998    Included within Appendix A, Design Criteria Package, Table A-2, p. A-32, but not anticipated to be applicable since HWMU to be clean (risk-based) closed by removal.    Storage Pad Morth of Plant 6 (36): Included within Appendix A, Design Criteria Package, Table A-2, pp. A-69 to A-74, but not anticipated to be applicable since HWMU to be clean (risk-based) closed by removal.    Storage Pad Morth of Plant 6 (36): Included within Appendix A, Design Criteria Package, Table A-2, pp. A-69 to A-74, but not anticipated to be applicable since HWMU to be clean (risk-based) closed by removal.    Certification Sampling Results: To be Submitted	applicable)3 - (Closure Guidance Item .16)		
11. Certification (Closure Guidance Item 3.18)  OU1 Remedial Action Report  OU3 Project Completion Reports  FINAL Plant 1 Complex - Phase 1 Project Completion Report, December 1997  FINAL Plant 1 Complex - Phase 1 Project Completion Report, December 1997  FINAL Project Completion Report, December 1999  FINAL Project Completion Report, April 1999  FINAL Project Completion Report, April 1999  FINAL Project Completion Report (and the Decontamination of HWMU No. 26 - UNH Tanks, Hot Raffinate Building and HWMU No. 25 - UNH Tanks, Hot Raffinate Building and HWMU No. 26 - Trane Incinerator, May 1999  FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report, October 1999  FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report, October 1999  FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report, October 1999  FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report, October 1999  FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report, October 1999  FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report, October 1999  FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report, October 1999  FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report, October 1999  FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report, October 1999  FINAL Miscellaneous Small Structures Decontamination Activities/Statement of Conformance Sta			Included within Appendix A, Design Criteria Package, Table A-2, p. A-32, but not
To be Submitted  OU3 Project Completion Reports  FINAL Plant 1 Complex – Phase 1 Project Completion Report, December 1997  FINAL Thorium/Plant 9 Complex Project Completion Report, April 1999  FINAL Project Completion Report for the Decontamination of HWMU No. 50 – UNH Tanks, Hot Raffinate Building and HWMU No. 28 – Trane Incinerator, May 1999  FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report for the Potential Project Task Order #432 Completion Report for the Potential Project, Task Order #432 Completion Report for the Potential Project, Task Order #432 Completion Report, October 1999  FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report, October 1999  FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report, October 1999  FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report, October 1999  FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report, October 1999  FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report, October 1999  FINAL Miscellaneous Small Structures Decontamination Small Structures Decontamination Project, Task Order #432 Completion Report for Each D&O Complex  FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report for Each D&O Complex  FINAL Miscellaneous Small Structures Decontamination Structures Decontamination Project Project Factor 2.0, pp. 5 to 6  FINAL Miscellaneous Small Structures Decontamination Project Project Factor 2.0, pp. 5 to 6  FINAL Miscellaneous Small Structures Decontamination Project Project Factor 2.0, pp. 5 to 6  FINAL Miscellaneous Small Structures Decontamination Project Project Project Factor 2.0, pp. 5 to 6  FINAL Miscellaneous Small Structures Project Proje	·		
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Project Completion Report, December 1997  FINAL Thorium/Plant 9 Complex Project Completion Report, April 1999  FINAL Project Completion Report for the Decontamination of HWMU No. 50 – UNH Tanks, Hot Raffinate Building and HWMU No. 28 – Trane Incinerator, May 1999  FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report, October 1999  FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report, October 1999  FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report, October 1999  FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report, October 1999  FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report, October 1999		OU3 Project Completion Reports	Performance Standards:
FINAL Project Completion Report for the Decontamination of HWMU No. 50 – UNH Tanks, Hot Raffinate Building and HWMU No. 28 – Trane Incinerator, May 1999  FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report, October 1999  FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report, October 1999  FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report, October 1999  FINAL Miscellaneous Small Structures Decontamination and Dismantlement Decontamination and Dismantlement Decontamination and Dismantlement Decontamination Summary; Section 2.5, HWMU No. 46		Project Completion Report, December	
the Decontamination of HWMU No. 50 – UNH Tanks, Hot Raffinate Building and HWMU No. 28 – Trane Incinerator, May 1999  FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report, October 1999  FINAL Miscellaneous Small Structures Decontamination and Dismantlement Section 2.4, pp. 5 to 6  FINAL Miscellaneous Small Structures Decontamination and Dismantlement Section 2.0, p. 1, Component-Specific Remediation Summary; Section 2.5, HWMU No. 46		·	
Decontamination and Dismantlement Project, Task Order #432 Completion Report, October 1999  KC-2 Warehouse – Bldg. 63 (34) Section 2.4, pp. 5 to 6  FINAL Miscellaneous Small Structures Decontamination and Dismantlement  UNH Tanks - NFS Storage Area (46): Section 2.0, p. 1, Component-Specific Remediation Summary; Section 2.5, HWMU No. 46		the Decontamination of HWMU No. 50 – UNH Tanks, Hot Raffinate Building and HWMU No. 28 – Trane	Trane Incinerator (28); UNH Tanks – Raffinate Bldg. (50)
Decontamination and Dismantlement Section 2.0, p. 1, Component-Specific Remediation Summary; Section 2.5, HWMU No. 46		Decontamination and Dismantlement Project, Task Order #432 Completion	Section 2.3, pp. 3 to 5  KC-2 Warehouse – Bldg. 63 (34)
Report, December 2000		Decontamination and Dismantlement Project, Task Order #464 Completion	



CLOSURE PLAN COMPONENT <sup>1</sup>	CERCLA DOCUMENT	CROSS REFERENCE INDEX
11. Certification (Closure Guidance Item 3.18) - Continued	OU5 Certification Reports for Individual Remediation Areas:	Area/Phase-Specific Certification Reports:  To be Submitted
	FINAL Certification Report for Area 1, Phase II, October 2000	Sludge Drying Beds (41): Section 2.1.5,3, Sector 3 Certification Units, pp. 2-9 to 2-11; Section 2.3, Statistical Analysis, pp. 2-12 to 2-13; Section 3.1, Excavation Activities, p. 3-1; Section 3.2, Changes to Scope of Work, pp. 3-3 to 3-5; Section 5.2, Sludge Drying Bed HWMU Closure, p. 5-3
	OU5 Remedial Action Report	Summary of Remedial Activities and Statement of Conformance with Requirements and Standards:  To be Submitted
12. Status of Facility (or Unit) After Closure (Closure Guidance Item 3.19)	OU1 FINAL Record of Decision, January 1995	Status of Waste Pits After OU1 Remedial Action: pp. 10-1 to 10-9
	OU3 FINAL Record of Decision for Interim Remedial Action, June 1994	Status of Production Area HWMUs After OU3 Remedial Action: Section 5.4, p. 11
	OU3 Final Record of Decision for Final Remedial Action, September 1996	Integration of the Interim and Final Remedial Actions, Section 2.1, p. 9
•	OU5 FINAL Record of Decision, January 1996	Status of FEMP After Soil and Groundwater Remediation: Section 4.0, p. 4-1
	OU5 FINAL Sitewide Excavation Plan, July 1998	Certification Reports: Section 7.4, pp. 7-10 to 7-14
	OU5 Certification Reports for Individual Remediation Areas	Status of those HWMUs That Had Soil Contamination After Soil Remedial Action: To be Submitted

<sup>&</sup>lt;sup>1</sup> Closure Guidance Items are from the Closure Plan Review Guidance for RCRA Facilities, Ohio EPA, March 1999.

<sup>&</sup>lt;sup>2</sup> The perched water contamination has many sources, only some of which are the HWMUs. Because of this, it is difficult or impossible to identify the degree to which a HWMU may have contributed to perched water contamination. Therefore, the nature and extent of contamination in the perched water, and the most appropriate remedial action method and objectives, are best achieved under the CERCLA process alone.

<sup>&</sup>lt;sup>3</sup> Ohio EPA has two options for clean closure where there are no more RCRA requirements (i.e., no post-closure requirements) for the existing HWMUs: (1) complete removal of waste and impacted environmental media, and (2) complete removal of waste and impacted environmental media to health-based standards (known at the FEMP as Final Remediation Levels, FRLs). Post closure requirements will, however, be applicable to the CERCLA on-property disposal cell as it will take some soil and debris contaminated with RCRA-hazardous waste [see Post Closure Care and Inspection Plan, On-Site Disposal Facility (20100-PL-010, Rev. 1, July 1997)].